## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

Webroot, Inc. and Open Text, Inc.,

Plaintiffs,

v.

Sophos Ltd.,

Defendant.

Sophos Ltd.,

Counterclaim-Plaintiff,

v.

Webroot, Inc., Open Text, Inc., and Open Text Corp.,

Counterclaim-Defendants.

Civil Action No. 6:22-cv-00240-ADA

JURY TRIAL DEMANDED

## NOTICE OF INTENT TO PROCEED WITH VENUE DISCOVERY

Plaintiffs Webroot, Inc. and Open Text, Inc. ("Plaintiffs") and counter-claim defendant Open Text Corporation ("OTC") file this Notice to inform all parties and the Court of its intent to proceed with venue discovery in accordance with the Court's Standing Orders.

On November 17, 2022, despite filing counterclaims for patent infringement against Plaintiffs and adding new party (OTC), Defendant and Counterclaim Plaintiff Sophos Ltd. filed a Motion to Transfer to the Austin Division of the Western District of Texas. Plaintiffs and OTC oppose this motion. Pursuant to the Court's standing orders, venue discovery automatically opens upon the filing of an initial venue motion and shall be completed no later 10 weeks after the filing of such motion. Plaintiffs also note this case is one of five CRSR related cases.

Plaintiffs and OTC hereby provides notice of its intent to proceed with venue discovery and briefing as outlined in the below schedule:

EVENT	DATE/DEADLINE
Initial Motion Filed	November 17, 2022
Venue Discovery Cut-Off	January 26, 2023
Plaintiffs' Response Brief	February 9, 2023
Sophos's Reply Brief	February 23, 2023

DATED: November 22, 2022 Respectfully submitted,

By: /s/ Mark D. Siegmund

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Counsel for Webroot, Inc., Open Text, Inc., and Open Text Corp.

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on November 22, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(b)(1).

/s/ Mark D. Siegmund Mark D. Siegmund